

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

LIMOLINER, INC.
Plaintiff

vs.

SETRA OF NORTH AMERICA, INC.
Defendant

NO.

05 - 11888 JLT

**MOTION OF SETRA OF NORTH AMERICA, INC., TO HAVE
WILLIAM J. CREMER AND THOMAS R. PENDER APPEAR *PRO HAC VICE***

Setra of North America, Inc. ("Setra"), by and through the undersigned counsel, hereby moves pursuant to Local Rule 83.5.3(b) for the admission of Attorney William J. Cremer and Attorney Thomas R. Pender *pro hac vice*. Attorney Cremer and Attorney Pender are partners in the law firm of Cremer Kopon Shaughnessy & Spina, LLC, 180 North LaSalle Street, Suite 3300, Chicago, Illinois 60601.

In support of this motion, and as set forth in the affidavits attached hereto as exhibits A and B, Setra and the undersigned state as follows:

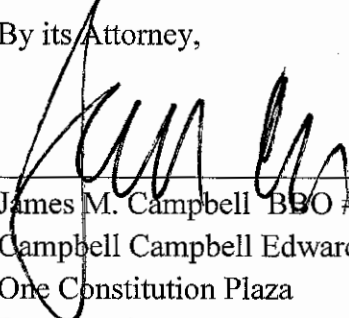
1. William J. Cremer is admitted to practice law in the State of Illinois, the United States District Court for the Northern District of Illinois, the United States Court of Appeals for the Seventh Circuit, and the United States Supreme Court.
2. There are no disciplinary proceedings against William J. Cremer in any jurisdiction in which he is admitted to practice law.

3. Thomas Pender is a member in good standing of the bars of the State of Illinois and the United States District Court for the Northern District of Illinois.
4. There are no disciplinary proceedings against Thomas R. Pender as a member of the bar in any jurisdiction.
5. Attorney Cremer and Attorney Pender are familiar with the Local Rules of the United States District Court for the District of Massachusetts.
6. A member in good standing of this Court, James M. Campbell of Campbell Campbell Edwards & Conroy, Professional Corporation, One Constitution Plaza, Boston, MA 02129, will serve as local counsel and assist Attorney Cremer and Attorney Pender with this matter.

For the foregoing reasons, this Court should permit Attorney William J. Cremer and Attorney Thomas R. Pender to appear *pro hac vice* on behalf of Setra for the duration of this lawsuit.

SETRA OF NORTH AMERICA, INC.,

By its Attorney,

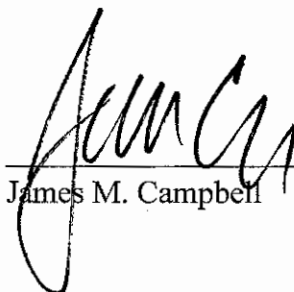


James M. Campbell BBO # 541882
Campbell Campbell Edwards & Conroy, P.C.
One Constitution Plaza
Boston, MA 02129
(617) 241-3000

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the following counsel of record for Limoliner, Inc., via Mail on September 16, 2005:

Jonathan D. Friedman, Esq.
Rudolph Friedman LLP
92 State Street
Boston, MA 02109



James M. Campbell

WJC/TRP/maz

381-2-1

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

LIMOLINER, INC.,

Plaintiff,

v.

SETRA OF NORTH AMERICA, INC.,

Defendant.

NO.

AFFIDAVIT OF WILLIAM J. CREMER

WILLIAM J. CREMER, being sworn, deposes and says:

1. I am a partner at the law firm of CREMER, KOPON, SHAUGNESSY & SPINA, LLC, 180 North LaSalle Street, Suite 3300, Chicago, IL 60601, and make this Affidavit in support of my application to be admitted *pro hac vice* to the bar of this Court.

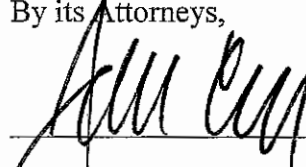
2. I received a Juris Doctor degree from the Loyola University School of Law in 1981, and was admitted to practice before the Courts of the State of Illinois and the United States District Court for the Northern District of Illinois in 1981. I was subsequently admitted to practice before the United States Court of Appeals for the Seventh Circuit in 1986, and the United States Supreme Court in 1988.

3. I practice as a defense attorney in the areas of products liability, construction litigation, professional negligence, and complex class actions. I also serve as national counsel for a variety of product manufacturers and other institutional clients.

4. I have never been held in contempt of court.

SETRA OF NORTH AMERICA, INC.,

By its Attorneys,

A handwritten signature in black ink, appearing to read "Jim Campbell", is written over a horizontal line.

James M. Campbell BBO # 541882
Campbell Campbell Edwards & Conroy, PC
One Constitution Center
Boston, MA 02129
(617) 241-3000

William J. Cremer
(pending admission *pro hac vice*)
Thomas R. Pender
(pending admission *pro hac vice*)
Cremer, Kopon, Shaughnessy & Spina, LLC
180 North LaSalle Street, Suite 3300
Chicago, IL 60601
Tel: (312) 726-3800
Fax: (312) 726-3818

WJC/TRP/maz

381-2-1

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

LIMOLINER, INC.,)	
)	
Plaintiff,)	
)	
v.)	
)	NO.
SETRA OF NORTH AMERICA, INC.,)	
)	
Defendant.)	
)	
)	

AFFIDAVIT OF THOMAS R. PENDER

THOMAS R. PENDER, being sworn, deposes and says:

1. I am a partner at the law firm of CREMER, KOPON, SHAUGNESSY & SPINA, LLC, 180 North LaSalle Street, Suite 3300, Chicago, IL 60601, (312) 726-3800, e-mail address -- tpender@cksslaw.com, and make this Affidavit in support of my application to be admitted *pro hac vice* to the bar of this Court.

2. I received a Juris Doctor degree from Washington and Lee University School of Law in 1987, and was admitted to practice before the Courts of the State of Illinois and the United States District Court for the Northern District of Illinois in 1988, and the United States District Court for the Central District of Illinois in 1990.

3. I practice as a defense attorney in the areas of products liability, construction litigation, complex class actions and international law.

4. I have never been held in contempt of court.

5. I have never been censured, suspended or disbarred by any court.

6. I have read and am familiar with the provisions of the Judicial Code (Title 28, U.S.C.) that pertain to the jurisdiction of and practice in United States District Courts, the Rules of Civil Procedure for the District Courts, the Federal Rules of Evidence for the United States Courts and Magistrates, and the Rules of the United States District Court for the District of Massachusetts.

7. I have read the Rules of Professional Conduct of the American Bar Association and will faithfully adhere thereto.

Dated this 15th day of September, 2005.


THOMAS R. PENDER

Subscribed and Sworn to me before me
this 15th day of September, 2005.

